



**Law Offices of Bennet & Bennet, PLLC**

***Maryland***

6124 MacArthur Boulevard  
Bethesda, Maryland 20816  
Tel: (202) 371-1500  
Fax: (202) 371-1558  
[www.bennetlaw.com](http://www.bennetlaw.com)

***District of Columbia***

5185 MacArthur Boulevard, NW, Suite 729  
Washington, DC 20016

**Caressa D. Bennet**  
**Michael R. Bennet**  
**Marjorie G. Spivak\***  
**Howard S. Shapiro**  
**Daryl A. Zakov^**

\* Admitted in DC & PA Only  
^Admitted in DC & FL Only

**Robert A. Silverman**  
**Anthony K. Veach#**  
**Erin P. Fitzgerald**  
***Of Counsel***  
**Tara B. Shostek**

^Admitted in DC & WA Only

February 3, 2015

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

Re: CPNI Certification and Accompanying Statement  
EB Docket No. 06-36

Dear Ms. Dortch:

CGKC&H No. 2 Rural Cellular Limited Partnership (“the Company”), by its attorneys and pursuant to Section 64.2009(e) of the Commission’s Rules, hereby submits its annual Customer Proprietary Network Information (CPNI) certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Marjorie Spivak

cc: Best Copy and Printing, Inc.

Attachments

## **Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

### **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

1. Date filed: February 2, 2015
2. Name of company(s) covered by this certification: CGKC&H No. 2 Rural Cellular Limited Partnership
3. Form 499 Filer ID: 809455
4. Name of signatory: Mike Higgins, Jr.
5. Title of signatory: General Manager
6. Certification:

I, Mike Higgins, Jr., certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*

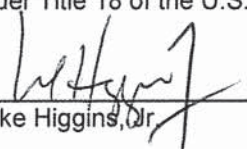
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
Mike Higgins, Jr.

**Attachments:** Accompanying Statement explaining CPNI procedures

## **CPNI Usage Policy Statement**

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("FCC") rules, this statement explains how CGKC&H No. 2 Rural Cellular Limited Partnership's (Company) operating procedures ensure compliance with Part 64, Subpart U of the FCC's rules.

The Company has chosen to prohibit the use of CPNI for marketing purposes by itself and between its affiliates.

The Company's CPNI Policy Manual includes a definition of CPNI.

Employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Policy Manual describes the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.

The Company has established a supervisory review process regarding Company compliance with the FCC's CPNI rules.

The Company requires an affirmative written subscriber request for the release of CPNI to third parties.

A Corporate Officer has been named as the CPNI Compliance Officer and is held responsible for annually certifying that the Company is in compliance with the FCC's CPNI rules and submitting the certification and an accompanying statement explaining how Company complies with the FCC's CPNI rules to the FCC prior to March 1.

### **Company Safeguards**

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company has safeguards in place to protect against unauthorized access to CPNI. The Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or an in-store visit.

The Company only discloses call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides a password that is not prompted by the carrier asking for readily available biographical information or account information. If a customer does not provide a password, Company only discloses call detail information by sending it to an address of record or by calling the customer at the telephone of record. If the customer is able to provide call detail information during a customer-initiated call without Company's assistance, then Company is permitted to discuss the call detail information provided by the customer.

The Company has established a system of passwords and password protection. For a new customer, Company requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Company must first authenticate the customer without the use of readily available biographical information or account information. Company authenticates a customer using non-public information such as calling the customer at the telephone number of record or using a Personal Identification Number (PIN) method to authenticate a customer.

For accounts that are password protected, Company cannot obtain the password by asking for readily available biographical information or account information to prompt the customer for his password.

A customer may access call detail information by establishing an online account or by visiting a carrier's retail location.

If a password is forgotten or lost, Company uses a back-up customer authentication method that is not based on readily available biographical information or account information.

If a customer does not want to establish a password, the customer may still access call detail based on a customer-initiated telephone call, by asking Company to send the call detail information to an address of record or by the carrier calling the telephone number of record.

Company protects online access to all CPNI, call detail and non-call detail.

Company provides customers with access to CPNI at a carrier's retail location if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

Company has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

In the event of a CPNI breach, Company complies with the FCC's rules regarding notice to law enforcement and customers. Company maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two years.

### **Actions Taken Against Data Brokers and Customer Complaints**

Company has taken no actions against data brokers in the last year. Company has received no customer complaints in the past year concerning the unauthorized release of CPNI.